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KING COUNTY
SUPERIOR COURT CLERK
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CASE #: 22-2-09926-7 KNT

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR KING COUNTY

TRAVIS VOSS-CURRY, an individual
Plaintiff,

v.

CROWN EQUIPMENT CORPORATION, an
Ohio corporation; and LATTCO SERVICES
INC., a California corporation,

Defendants.

CASE NO.

COMPLAINT FOR DAMAGES

I. PARTIES, JURISDICTION AND VENUE

1.1 Plaintiff, Travis Voss-Curry (“Mr. Voss-Curry”), is an individual residing in Pierce County, Washington.

1 1.2 Defendant Crown Equipment Corporation (“Crown”) is an Ohio corporation
2 operating in King County, Washington.

3 1.3 Defendant Lattco Services Inc. (“Lattco”) is a California corporation operating in
4 King County, Washington.

5 1.4 This Court has original jurisdiction in this matter pursuant to RCW 2.08.010.

6 1.5 Venue is proper in King County pursuant to RCW 4.12.020.

7
8 **II. FACTUAL ALLEGATIONS**

9 2.1 Plaintiff works, and at all times relevant to the complaint worked as a warehouse
10 employee at a distribution center operated by Sysco Seattle, Inc. (“Sysco”) located in Kent,
11 Washington.

12 2.2 Defendant Crown supplies pallet jacks to Sysco.

13 2.3 Defendant Lattco contracted with Sysco to provide cleaning services. Upon
14 information and belief, the contract between Lattco and Sysco provided that Lattco would ensure
15 that the warehouse was clean and that the warehouse floor was free of hazards.

16 2.4 On August 29, 2021, Mr. Voss-Curry was assigned to work on a triple pallet jack,
17 manufactured by Crown.

18 2.5 At approximately 8:15 p.m., Mr. Voss-Curry entered the chill section of the
19 warehouse after returning from his break to resume work.

20 2.6 There was liquid on the warehouse floor that made the floor slippery.

21 2.7 Mr. Voss-Curry attempted to turn on his triple pallet jack, when the equipment
22 slipped and the steering controls immediately overturned and pulled him forward causing him to
23 lose his footing.
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1 2.8 As a result, his foot slipped off the standing plate in the front of the pallet jack,
2 causing the equipment to smash his foot between the pallet jack and the equipment.

3 2.9 The handle of the pallet jack then broke off across Mr. Voss-Curry's waist, causing
4 the actual control handle to sheer off and causing him to fall on the ground.

5 2.10 Mr. Voss-Curry felt immediate pain in his left foot and across his torso and pelvis.

6 2.11 A coworker went to find a manager who called 911 and the medics shortly arrived
7 at the warehouse.
8

9 2.12 The medics transferred him to Valley Medical Center in the emergency room where
10 he was tested and assessed.

11 2.13 He was diagnosed with a lacerated vein in his left foot and a fracture to his
12 calcaneus bone.

13 2.14 He spent the evening in surgery to repair the vein in his foot and remove any
14 harmful material.
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16 2.15 After he was released, he began to work on recovery through physical therapy and
17 regular doctor's visits.

18 2.16 As a result of the impact, Mr. Voss-Curry suffered severe physical injuries
19 requiring extensive medical care.

20 2.17 As a result of the accident, Mr. Voss-Curry continues to suffer to this day, as it has
21 affected and continues to affect his physical and psychological well-being, his ability to fully enjoy
22 life as he had prior to the impact, and upon information and belief has resulted in a permanent
23 partial disability.
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III. FIRST CAUSE OF ACTION
Negligence

3.1 Plaintiff realleges paragraphs 1.1 through 2.17 as though fully set forth herein.

3.2 Defendants' actions and/or omissions constitute negligence under common law.

3.3 As a result of Defendants' negligence, Plaintiff has been damaged in an amount to be proven at trial.

IV. SECOND CAUSE OF ACTION
Manufacturer Products Liability
RCW 7.72.030
(Defendant Crown Only)

4.1 Plaintiff realleges paragraphs 1.1 through 3.3 as though fully set forth herein.

4.2 Defendants' actions and/or omissions constitute product liability of a product manufacturer pursuant to RCW 7.72.030.

4.3 As a result of Defendants' liability under RCW 7.72, Plaintiff has been damaged in an amount to be proven at trial.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court enter an order granting the following relief:

1. An order finding both Defendants jointly and severally liable under common law negligence for Mr. Voss-Curry's injuries sustained as a result of the accident;

2. An order finding Defendant Crown liable as a product manufacturer pursuant to RCW 7.72.030.

3. An order granting Plaintiff specific and general damages in an amount to be proven at trial as a result of the negligent conduct of Defendants

5. An award of attorney's fees and costs; and
6. Such other and further relief as the Court deems just and equitable.

RESPECTFULLY SUBMITTED this 28th day of June, 2022.

VANGUARD LAW

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